

EXHIBIT 4

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
(Austin Division)

DANIEL BOSTIC,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:22-cv-158-RP
)	
THE DAILY DOT, LLC <i>et al.</i> ,)	
)	
Defendants.)	
_____)	

**PLAINTIFF DANIEL BOSTIC'S ANSWERS AND OBJECTIONS TO
DEFENDANT DAILY DOT'S FIRST INTERROGATORIES**

Plaintiff Daniel Bostic, by counsel, hereby submits his answers and objections to Defendant Daily Dot's First Interrogatories.

Introductory Statement

The information supplied in these Answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, agents, representatives, and attorneys unless privileged.

The word usage and sentence structure may be that of the attorney assisting in the preparation of these Answers and, thus, does not necessarily purport to be the precise language of the executing party.

All answers furnished are subject to, in reliance upon, and without waiver of, objections previously filed or otherwise asserted herein.

INTERROGATORIES

1. Identify all persons who have a subrogation or other financial interest in the causes of action set forth in your Amended Complaint, including any persons

funding this action in whole or in part regardless of any expectation of payment, reimbursement, or compensation in return for such funding, and describe the specific nature and extent of that interest.

Answer: None.

2. For every allegedly false and defamatory statement you contend any of the Defendants made about you to anyone, identify for each such statement (1) the date the statement was made, (2) the name of the person who made it; (3) how they made it; (4) what they said; (5) the names of every person who heard or received the statement; and (6) what you contend to be false about the statement and what you contend to be the truth about the matter, setting forth all facts supporting your contention in a format substantially similar to the table below:

Objection: Mr. Bostic objects to this interrogatory to the extent that it is a compound interrogatory, that it calls for a narrative response as to the facts supporting the “truth of the matter,” and that it requires the answer to be in any particular format.

Answer: Without waiving objections, Mr. Bostic refers to the allegations of the Amended Complaint. More specifically, the following defamatory statements were made, in writing, by Zachary Petrizzo in his role as a journalist for The Daily Dot, LLC, and published by The Daily Dot, LLC on February 13, 2021. They were viewed by thousands and potentially millions of people, as Daily Dot boasts an audience of 23 million global unique visits.

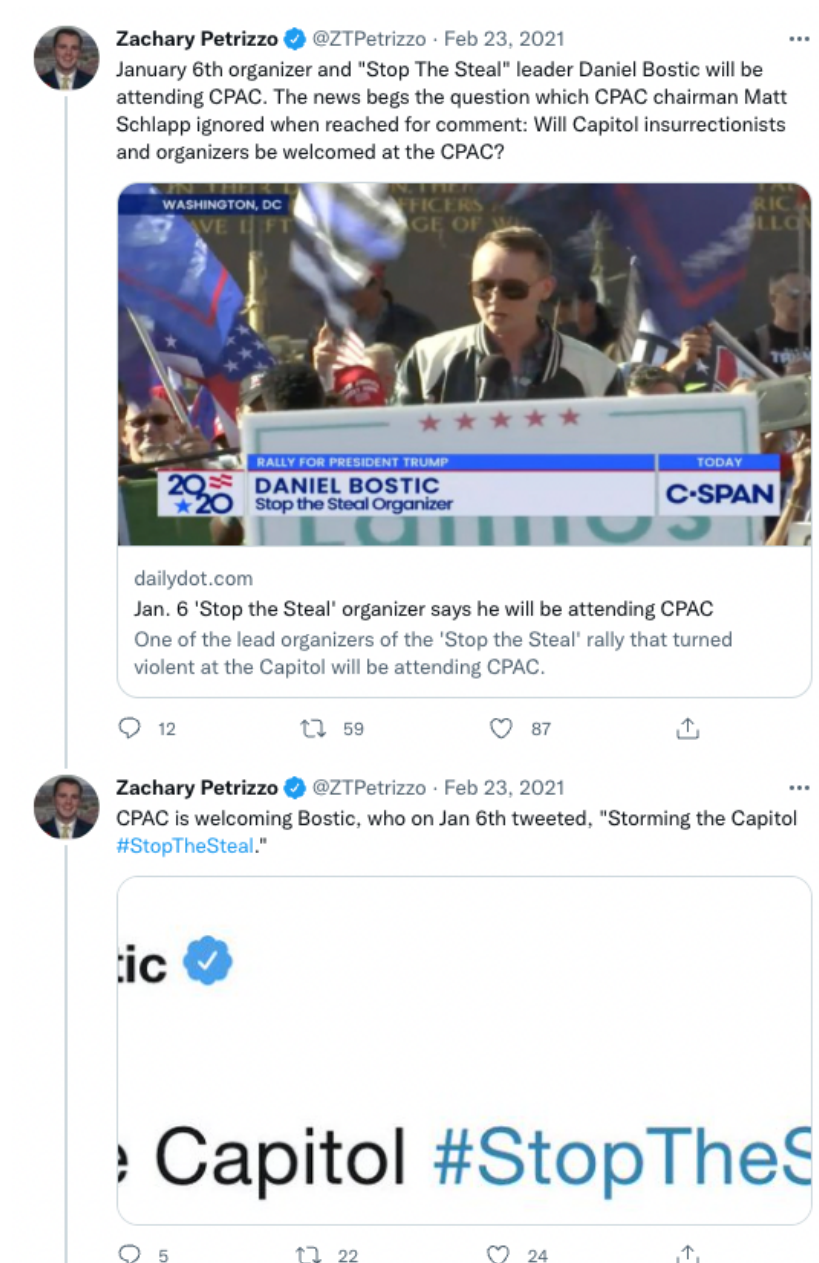
- Headline of the Article: “Jan. 6 ‘Stop the Steal’ organizer says he will be attending CPAC”. That headline, when read in the context of the article and the header photo that depicts an image of Daniel Bostic, clearly refers to Daniel Bostic. Also reading it in context of the article, it asserts that Mr. Bostic was an organizer of the violent riots that occurred on January 6, 2021. That is false. Mr. Bostic was not involved in any leadership or organizational role in anything that occurred on January 6, 2021. Even considering his limited involvement with the Stop the Steal (“STS”) organization, STS had nothing to do with the violence that occurred, and to assert that STS or anyone affiliated with STS was an organizer of the riots or violence is false.
- “**Jan. 6 Capital riot organizer** and ‘Stop The Steal’ leader Daniel Bostic announced he would be attending the Conservative Political Action Conference (CPAC) in Orlando, Florida, later this week.” (emphasis added). Mr. Bostic had nothing to do with the riots that occurred at the Capitol on January 6, 2021, and to accuse him of organizing those riots is patently false.
- “**Bostic**, a close ally to far-right activist Ali Alexander (formerly Ali Akbar), who is currently under an FBI investigation, **helped coordinate the Jan. 6 Capitol insurrection** while leading the ‘Stop The Steal’ movement.” (emphasis added). Mr. Bostic had nothing to do with the violence, trespassing, and rioting at the U.S. Capitol on January 6, 2021, that is commonly referred to as the “Capitol insurrection.” He did not trespass at the Capitol or participate in any violence or rioting on that day (or any other day), and he certainly did not coordinate or

help coordinate the “insurrection” or any of the illegal behavior that occurred that day. For that matter, Mr. Bostic did not coordinate or help coordinate *any* activity on January 6, 2021.

- Header photo, captured from C-SPAN Campaign 2020 coverage of a rally in support of President Trump that occurred on or about November 14, 2020, depicting Mr. Bostic addressing a crowd, with a chyron that reads “Rally for President Trump” and “Daniel Bostic, Stop the Steal Organizer.” The image contains location and time stamps of “Washington, DC” and “Today,” respectively. The image also depicts C-SPAN’s logo for its Campaign 2020 coverage—a stylized image of “2020” with flourishes of red and white stripes and a blue star—which accompanies many C-SPAN videos relating to the 2020 presidential election, including those that did not air in the year 2020. In other words, the Campaign 2020 logo is not a time stamp to indicate that the video is from 2020 (indeed, there is a separate time stamp that reads “Today”); rather, it is reasonably and commonly understood to mean that the video relates to the 2020 election. Viewed in context with the headline and body of the accompanying article, this image implies and conveys to any average reader that Mr. Bostic was a featured speaker or otherwise addressed the crowds on January 6, 2021. Mr. Bostic was not a speaker on January 6, 2021, nor did he address any crowds that day. Petrizzo and/or The Daily Dot’s conscious and deliberately misleading choice to use this specific image to accompany the article is itself defamatory. The choice of image also reinforces

the defamatory statements contained within the article, and it evidences the malice of Defendants in their attempt to depict Mr. Bostic as an instigator and organizer of the riots on January 6, 2021, despite knowing that he was not.

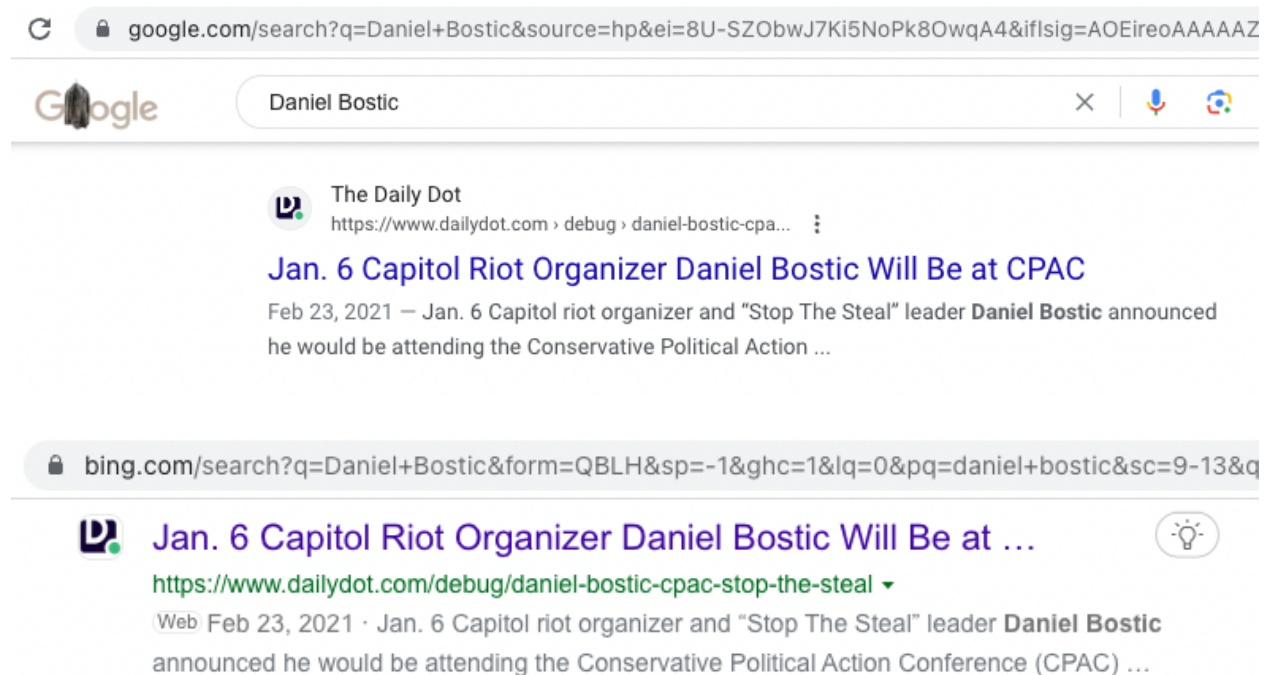
Also on February 23, 2021, Defendant Petrizzo tweeted a link to the article:

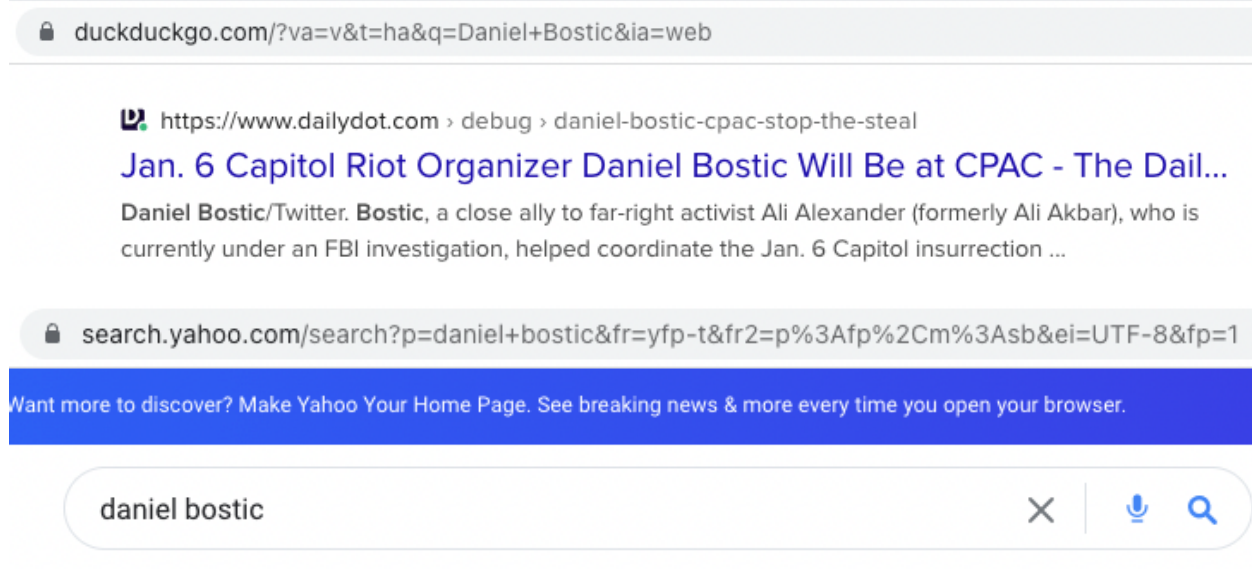


The tweet includes the header photo of the article, described above, a headline—“Jan. 6 ‘Stop the Steal’ organizer says he will be attending CPAC”—and a subheading—“One of the lead organizers of the ‘Stop the Steal’ rally that turned violent at the Capitol will be attending CPAC.” Petrizzo wrote in the tweet: “January 6th organizer and ‘Stop the Steal’ leader Daniel Bostic will be attending CPAC. The news begs the question which CPAC chairman Matt Schlapp ignored when reached for comment: Will Capitol insurrectionists and organizers be welcomed at the CPAC?” This tweet once again falsely claims that Mr. Bostic was an “organizer” of a “rally that turned violent at the Capitol” and that he was a “Capitol insurrectionist[] and organizer[]”. Read in context with the linked article, the misleading header photo, and the false statements contained within the article, the tweet further implies or asserts that Mr. Bostic was an organizer, instigator, and leader of the violent protests on January 6. Mr. Bostic organized nothing on January 6, 2021, and he did not participate in any way with the riots or insurrection. Petrizzo’s tweet was viewed by thousands of people, as he currently has over 85,000 followers on Twitter.

Immediately after, Petrizzo tweeted again, this time stating “CPAC is welcoming Bostic, who on Jan 6th tweeted, ‘Storming the Capitol #StopTheSteal.’” Included with this tweet, Petrizzo included a cropped or otherwise edited image of a tweet from Mr. Bostic, omitting the time stamp and omitting the reference in the tweet to missing media. This image, its editing, and its lack of time stamp, was chosen by Petrizzo to give the false impression that Mr. Bostic was part of the violent riots and breaches of the Capitol that occurred later that day.

On or about February 23, 2021, Defendant Petrizzo and/or Defendant Daily Dot, submitted metadata for search engine optimization and search results to the various internet search engines (i.e., Google, Bing, Yahoo, Duckduckgo, etc.). The headline submitted by Defendants for search engine results reads “Jan. 6 Capitol Riot Organizer Daniel Bostic Will Be at CPAC.” As discussed, Mr. Bostic had nothing to do with any riots at the Capitol, and to call him a “Capitol Riot Organizer”—and have that be one of the top search engine results upon searching for Daniel Bostic on the internet—is blatantly false and defamatory. Additionally, the deliberate choice to make the headline about Mr. Bostic in search engine results even more salacious than the actual headline of the article on the Daily Dot website, evidences the Defendants’ malice. They chose the most outrageous, and false allegation to draw more viewers and get more “clicks” without any regard for the truth or for the damage that would be inflicted upon Mr. Bostic.





On or about February 23, 2021, Defendant Petrizzo contacted the organizers of CPAC 2021 by phone and orally restated his smear that Mr. Bostic was an organizer and architect of the insurrection and riots on January 6, 2021. As discussed above, those accusations were false.

3. For any damages that you contend you sustained as a result of any conduct or statement by any of the Defendants, identify with particularity (1) the nature of the alleged damages, (2) the amount of such damages and how you calculate them, (3) all persons with knowledge of facts relating to those damages, including any facts that tend to mitigate or disprove the existence of those damages, and the substance of their knowledge, and (4) all documents you

contend support those damages.

Answer: Mr. Bostic seeks presumed per se damages as a result of being accused of a crime. Those damages are estimated to be up to \$15,000,000. Mr. Bostic also seeks compensatory damages for non-economic losses, including mental anguish and lost reputation. Mr. Bostic will likely never be able to work for a major company or studio. Those damages are estimated to be up to \$15,000,000. Mr. Bostic also seeks compensatory damages for the treatment he underwent as a result of the defamatory article, which includes approximately \$10,000 in therapy and psychiatric treatment. Mr. Bostic also seeks compensatory damages for damage to his business and business opportunities. Those damages are estimated to be up to \$100,000. Mr. Bostic seeks punitive damages in an amount up to \$750,000

4. Identify every contractual relationship you contend was interfered with in any way by publication of the Article or any other conduct you attribute to Defendants. In doing so, identify (1) all of the parties to such contract(s) or agreement(s) and all persons with a financial interest in those contract(s) or agreement(s), (2) the purpose or subject matter of those contract(s) or agreement(s), (3) whether the contract(s) or agreement(s) were written or oral, (4) the persons with whom you engaged in any communications concerning the contract(s), (5) the manner in which you contend the contract(s) or agreement(s) were interfered with, and (6) the amount and method of calculating any damages flowing from the disruption of the contract(s) or agreement(s).

Objection: Mr. Bostic objects to the compound nature of this interrogatory.

Answer: Without waiving objections, Mr. Bostic refers to his being disinvited from CPAC.

5. Set forth with particularity all facts concerning the “events” or “business opportunities” that, as you allege in paragraph 37 and 52 of the Amended Complaint, you “were disinvited and cancelled from” or lost as a result of the Article or any other conduct by Defendants. In doing so, in addition to describing the events and opportunities, identify (1) the persons with whom you engaged in any communications concerning the event(s) or opportunities, (2) the type or subject matter of the event or opportunity at issue, (3) the manner in which you contend the contract or agreement was interfered with, and (4) the amount and method of calculating any damages flowing from the loss of opportunity or event cancellation.

Answer: Mr. Bostic was a producer on the documentary film The Plot Against the President, which had recently released in October 2020. At the time of the defamatory article, Mr. Bostic was actively promoting the film and interest in the subject matter—the Russia collusion hoax that was weaponized against the nascent Trump administration in 2016—was at an all-time high. The timing for CPAC 2021 was ideal for Mr. Bostic to not only promote the film to the approximately 10,000 attendees, but to network with and promote the film to some of the most prominent Conservative influencers in the country. In addition to the reach CPAC would provide

to the film, it would have given Mr. Bostic the opportunity to highlight his own role in the production and get his name and reputation out to prominent Conservatives.

As a direct result of the defamatory article, and Defendant Petrizzo's communications with the organizers of CPAC, Mr. Bostic was disinvited from CPAC 2021 and was not allowed to attend for the most critical and influential days of the conference.

6. Identify all social media accounts from which you posted any content, whether on behalf of yourself or any other person who authorized you to post content and regardless of whose name is on the account, from November 1, 2020, through March 31, 2021, and the user name(s) associated with each account.

Answer: Twitter (debostic); Periscope (debostic); Parler (bostic); Instagram (debostic); Telegram Channel (danielbostic)

7. For every cellular or landline phone account you used or were authorized by any person to use from November 1, 2020, through March 31, 2021, identify (1) the account service provider (*e.g.*, Verizon, T-Mobile, etc.), (2) the name of the account holder, and (3) the phone number(s) associated with that account.

Answer: Daniel Bostic 843.259.7855 (T-Mobile or Verizon)

Daniel Bostic 202.815.8152 (Unknown)

8. For every messaging application (*e.g.*, iMessage, Messenger, Signal, WhatsApp, Slack, Telegram, Zello, etc.) on which you sent or received any type of message (on behalf of yourself or any other person) from November 1, 2020, through March 31, 2021, identify (1) the application, (2) the name(s), phone number(s), and/or email address(es) used to create the account(s) used in that application, and (3) the user name(s) associated with the account(s) for each application.

Answer: iMessage (Daniel Bostic, 843-259-7855); Signal (Daniel Bostic, +1 843-259-7855); Telegram (@dan8656)

9. Identify the names or titles of all online groups or group chats (*e.g.*, text-messaging groups, Telegram groups, Facebook groups, Slack channels, or similar chat or messaging or other groups) to which you belonged, subscribed, or otherwise participated in any way from November 1, 2020, through March 31, 2021, that engaged in any discussions concerning any Stop the Steal Group, the 2020 U.S. presidential election, or the integrity of the ballot-counting process in any state during that election. In doing so, ensure your response identifies which platform(s) or messaging application(s) the group used (if applicable) and identify the names (both actual and names as they appear in your contacts list) and phone numbers of all persons who were included in that group.

Objection: Mr. Bostic objects to this interrogatory as compound, overly broad, unduly burdensome, and not proportional to the needs of this case. Seeking the

identity of every person with which Mr. Bostic has discussed the 2020 U.S. presidential election or the integrity of the ballot-counting process in one of the most contentious and contested elections of our lifetimes, is extremely overbroad and unduly burdensome, and not relevant to the allegations of this case. To the extent that Mr. Bostic participated in group chats about the rallies and/or protests of January 6, 2021, or about Stop the Steel group, Mr. Bostic will provide the names of the chat groups.

Answer: #STS Website, #STS Research, #STS Video, Leadership Core, #STS Vetting, #STS Graphics (all Telegram). The chat group history is produced herewith, with identifiers redacted, pending the entry of an appropriate protective order to protect the privacy of individuals who are only tangentially related to the claims and defenses in this case. The risk and consequences of doxxing are all too real to these individuals, most of whom were simply patriotic moms and business owners who volunteered their time for their belief in upholding election integrity.

10. If you sent or received any text messages from any group text named, at any point from November 1, 2020, through January 31, 2021, as “STS Management” or “STS Patriots,” identify the names (both actual and names as they appear in your contacts list) and phone numbers of all persons who were included in that group.

Answer: None / N/A

11. Identify every text-messaging group you participated in at any point from November 1, 2020, through January 31, 2021, that exchanged any text messages concerning the 2020 U.S. presidential election or the integrity of the ballot-counting process in any state during that election. In doing so, provide the name (if any) of the group and the names (both actual and names as they appear in your contacts list) and phone numbers of all persons who were included in that group.

Objection: This interrogatory appears to be duplicative of Interrogatory No. 9; however, to the extent that it is different, Mr. Bostic objects to this interrogatory as overly broad, unduly burdensome, and not proportional to the needs of this case. Seeking the identity of every person with which Mr. Bostic has discussed the 2020 U.S. presidential election or the integrity of the ballot-counting process in one of the most contentious and contested elections of our lifetimes, is extremely overbroad and unduly burdensome, and not relevant to the allegations of this case. To the extent that Mr. Bostic participated in group chats about the rallies and/or protests of January 6, 2021, or about Stop the Steel group, Mr. Bostic will provide a responsive answer.

Answer: Without waiving objections, #STS Website, #STS Research, #STS Video, Leadership Core, #STS Vetting, #STS Graphics (all Telegram); additionally, Mr. Bostic discussed relevant topics with family members in an SMS group text. The chat group history and group texts are produced herewith, with identifiers redacted, pending the entry of an appropriate protective order to protect the privacy of

individuals who are only tangentially related to the claims and defenses in this case. The risk and consequences of doxxing are all too real to these individuals, most of whom were simply patriotic moms and business owners who volunteered their time for their belief in upholding election integrity.

12. Identify every rally, event, or gathering of any type you attended that was promoted as being, and/or in fact was, affiliated in any way with the organization, movement, or phrase “Stop the Steal” or that otherwise concerned the 2020 U.S. presidential election or the integrity of the ballot-counting process in any state during that election.

Objection: Mr. Bostic objects to this interrogatory as overly broad and unduly burdensome and not proportional to the needs of this case. Stop the Steal was formed in 2018 and was largely concerned with election irregularities in the 2018 Florida senate and gubernatorial elections. Mr. Bostic participated in many Stop the Steal events during that time but requiring him to specifically identify all of those events from 5 years ago is not reasonable given the subject matter of this case, which concerns the 2020 election. To the extent that Mr. Bostic participated in any Stop the Steal events that relate to the 2020 election, Mr. Bostic will provide a responsive answer.

Answer: Stop the Steal Atlanta, GA – November 2020

Stop the Steal Washington, DC – December 2020

Stop The Steal Carson City, NV – November 2020

Stop The Steal Washington, DC – January 2021

13. Identify every alias, nickname, pseudonym, handle, or name other than “debostic,” “Daniel,” or “Daniel Bostic” that you have used or responded to in any actual or virtual conversation with any person since January 1, 2020.

Answer: None

14. Identify every person you spoke with on January 5–6, 2021, whether in person, by telephone, by text, by social media, by messaging platform, or by any other means of communication, and describe what you spoke with that person about and on what date.

Objection: Mr. Bostic objects to this interrogatory as overly broad and unduly burdensome and not proportional to the needs of this case. To the extent that Mr. Bostic communicated with anyone on January 5–6, 2021 about Stop the Steal, or about the events, rallies, or protests of January 6, 2021 at the U.S. Capitol, Mr. Bostic will identify those individuals.

Answer: Ali Alexander, Jesse Binnall, Patrick [redacted pending entry of protective order], Megan Barth, Courtney Holland, Lucas [redacted pending entry of protective order], Levi [redacted pending entry of protective order], and John [redacted pending entry of protective order], Joel Northrop. I also sent a text on January 6, 2021, produced herewith, to several of my family members in a group SMS.

15. [none]

16. Identify every company or any other type of entity in which you hold or have ever held any ownership interest.

Answer: Cystra, LLC – Sole Member

Cystra Ventures Ltd Co – Sole Member

Fidelius Holdings, LLC – Sole Member

VERIFICATION

I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief:

01/20/23
Date


Daniel Bostic

Dated: June 20, 2023

Respectfully Submitted,

/s/ Jason C. Greaves

Jason C. Greaves (*pro hac vice*)

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CERTIFICATE OF SERVICE

I certify that on June 20, 2023, a copy of the foregoing was delivered to counsel for Defendants by email.

/s/ Jason C. Greaves
Jason C. Greaves